

PHONE MEMO

230840



Contact: Bill Friedman

Phone #: 973-403-3108

Of: WolfBlock Brach Eichler

Date: March 11, 2005

Case Name: Unimatic Manufacturing Co.

Case #: E20010335

RE: Bill Friedman called regarding the current cleanup inside the building.

1. Approx. 11:50 PM I returned Mr. Friedman's call from 3/10/05 (4:45 PM). Bill Friedman wants a coordinated effort between OSHA and NJDEP in regard to the emergency cleanup. I told Bill Friedman that NJDEP does not have jurisdiction over employees health and safety issues. Bill Friedman stated that since OSHA is now involved we need a coordinated effort between NJDEP and OSHA. I told Bill Friedman that I will discuss this with John Graham and get back to him.

2. Approx. 12:20 PM: John Graham and I spoke to Bill Friedman and John told Mr. Friedman that NJDEP is not approving or reviewing the RP's sampling plans for interior remediation. Building interiors are not regulated by NJDEP unless there is contaminant migration from the contamination beneath the building to the interior or an impact to the outside environment from contamination inside the building; pursuant to the Technical Requirements for Site Remediation, 7:26E-3.5. John told Mr. Friedman that since OSHA is involved they don't expect interior cleanup approval from NJDEP.

- **Concrete Coring:** Mr. Friedman expressed his concern that coring through the concrete is necessary but they don't want to drill through the floor after the sealant/epoxy is applied to cover the black-stained concrete floor. Mr. Friedman would like to have Ben Alter on the line with us to further discuss the coring and epoxy application regarding the concrete borehole sampling plan dated March 2, 2005.

- **Clean Zone:** John told Mr. Friedman that they (the RP) needs to identify a clean zone in the concrete boreholes, vertically, through the two hottest chip samples. Mr. Friedman stated that the impacted area (surface of the black-stained concrete floor) is a 100-foot by 50-foot area, based on the chip sampled area that had exceedances of PCBs.

PHONE MEMO

- **PCB Mobility:** John told Mr. Friedman that they (the RP) needs to determine the mobility of the PCBs through the concrete. Furthermore, John told Mr. Friedman that the proposed concrete borehole investigation (two boreholes) does not alleviate Unimatic from delineating PCBs in soils beneath the building. Conclusion of this phone call – we (John and I) will discuss the concrete borehole sampling plan with Terry McAdams and get back to Mr. Friedman as soon as possible.

3. John and I reviewed the concrete borehole sampling plan with Terry McAdams and it was determined to install two borings at locations that depicted the two “hottest” chip sample locations, CFT-7 (9,200 mg/kg) and CFT-11 (4,500 mg/kg). One of the two locations proposed by GZA needs to be changed. Therefore, one proposed borehole will not be installed at chip sample CFT-10, which was Not Detected (ND) for PCBs. It appears that GZA selected the two locations (CFT-7 and CFT-10) based on former Geoprobe soil sample locations, FT-7 and FT-10, that were installed in November 2003. GZA selected these two locations because the soil samples had exceedances of PCBs.

4. Approx. 1 PM: John Graham and I returned Mr. Friedman’s call, this conference call included Ben Alter of GZA Geoenvironmental.

- **Concrete Borehole Locations:** Ben Alter confirmed that the two concrete boring locations depicted on GZA’s figure, March 2 submittal, were selected based on the November 2003 geoprobe locations that had exceedances of PCBs in soils beneath the building. John told Mr. Friedman that they (the RP) does not have to collect soil samples at the bottom of the concrete borehole because they have soil analytical data from these same boreholes. Ben Alter confirmed that the boreholes will be drilled through the entire portion of concrete to the concrete/soil interface.

However, PCB need to be delineated in soil beneath the bldg.

- **Concrete Sampling:** NJDEP gave verbal approval over the phone for GZA’s subsurface concrete sampling plan. GZA will collect concrete samples for PCBs from boreholes at chip sample locations No. CFT-7 and CFT-11.

*OK Rcd. x
edited
4-26-05*

PHONE MEMO

- **Building Interior Cleanup:** NJDEP emphasized that the RP does not NJDEP approval for their remedy of the building interior unless it is impacting the environment. Mr. Friedman stated that at this time it is uncertain whether or not the black-staining on the concrete floor is coming from beneath the concrete floor. Furthermore, Mr. Friedman stated that since concrete is porous that it is suspected that the use of the fork-lift squeezed the oil out of the concrete subsurface to the surface which is seen as the black-stained concrete floor.
- **Horizontal Delineation:** The RP proposed further chip/wipe samples based on the current OSHA investigation. These proposed sample locations are on the same figure depicting the proposed concrete boring locations. John asked the RP to provide NJDEP with the analytical results of the chip/wipe samples that were requested by OSHA so the NJDEP can verify that the surface of the concrete floor is horizontally delineated. The RP agreed to this. In addition, NJDEP made it clear to the RP that the proposed concrete borehole investigation (two boreholes) does not alleviate Unimatic from delineating PCBs in soils beneath the building.

John: 3-14-05
Please provide

Comments, you can
write right on the
phone memo.

I will include
this phone memo in the
left side.

Thanks,
Gene